United States Environmental Protection Agency
Region 1 – EPA New England
5 Post Office Square – Suite 100
Boston, MA 02109-3912

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

February 13, 2014

Mr. Sidney J. Holbrook
Executive Director
Greater New Haven Water Pollution Control Authority
260 East Street
New Haven, CT 06511

Re: Request for Information Pursuant to Section 308 of the Clean Water Act; EPA Docket No. 14-308-05

Dear Mr. Holbrook:

The EPA has received a complaint from a citizen regarding flooding of the Under Air Rights Garage ("UARG") located at 60 York Street, New Haven, Connecticut. On August 10, 2012, the citizen observed flooding and a sewage smell in the UARG. After contacting the Greater New Haven Water Pollution Control Authority ("GNHWPCA"), the citizen learned of the presence of combined sewer overflow (CSO) regulator 031 at the southeast corner of the UARG.

During the EPA inspection of GNHWPCA's operation and maintenance of its collection system on December 16-18, 2013, GNHWPCA provided EPA inspectors with an email and photos indicating that CSO regulator 031 was closed on October 10, 2013. EPA inspectors visited the CSO regulator on December 17, 2013 to verify that it remained closed. GNHWPCA provided EPA inspectors with a Collection System Map, undated; an Annual Progress Report, dated June 28, 2013; and a CSO Flow Monitoring Plan Status Report, dated December 18, 2013, identifying several additional combined sewer overflow regulators in the vicinity of the UARG.

On December 13, 2013, EPA obtained from the citizen a copy of the Drainage Study for Route 34 and Union Avenue ("Drainage Study") prepared for the City of New Haven by Cardinal Engineering Associates ("Cardinal"), dated July 11, 2012. In the Drainage Study, Cardinal performed hydraulic modeling of the storm drain system and the combined sewer system. The Drainage Study identifies six sections of combined sewer that do not have sufficient capacity to convey a 10-year storm, even with the combined sewer overflow relief points available to the drainage system. The result, according to the Drainage Study, is the potential for discharges of untreated sewage to roadways.

Attached is a request for information asking you to identify the conditions, including precipitation events, which result in the presence of sewage in the UARG and at similar locations. A similar request been sent to the City of New Haven.

Section 308(a) of the Clean Water Act (the "Act"), U.S.C. § 1318(a), authorizes the Environmental Protection Agency ("EPA") to require the owner or operator of a point source to provide information needed to determine whether there has been a violation of the Act.

The GNHWPCA is hereby required, pursuant to Section 308(a) of the Act, U.S.C. § 1318(a), to respond to this Request for Information (the "Request") within **90 calendar days of receipt of this letter**, except where noted otherwise. Please read the instructions in Attachment A carefully before preparing your response and answer each question in Attachment B as clearly and completely as possible.

Your response to this Request must also be accompanied by a certificate that it is signed and dated by the person who is authorized to respond to the Request. A Statement of Certification, Attachment C, is attached to this letter.

Information submitted pursuant to this Request shall be sent by certified mail and shall be addressed as follows:

United States Environmental Protection Agency
New England Region
5 Post Office Square - Suite 100 (OES 04-1)
Boston, MA 02109-3912
Attn: Jack Melcher

and

Connecticut Department of Energy and Environmental Protection
Bureau of Water Protection and Land Reuse
Planning and Standards Division
79 Elm Street
Hartford, CT 06106-5127
Attn: George Hicks

If you have questions regarding this Request, please contact Jack Melcher of my staff at (617) 918-1663 or have your attorney contact Michael Wagner at (617) 918-1735.

Sincerely,

James Chow, Chief
Technical Enforcement Branch

cc: George Hicks, Connecticut Department of Energy and Environmental Protection

Attachment A

Information Request

1. Provide a separate narrative response to each and every question and subpart of a question set forth in this Request. Precede each answer with the text and the number of the question and the subpart to which the answer corresponds.

2. If any question cannot be answered in full, answer to the extent possible. If your responses are qualified in any manner, explain.

3. Any documents referenced or relied upon by you to answer any of the questions in the Request must be copied and submitted to EPA with your response. All documents must contain a notation indicating the question and subpart to which they are responding. If the documentation that supports a response to one item duplicates the documentation that supports another item, submit one copy of the documentation and reference the documentation in subsequent responses.

4. If information or documents not known or not available to you as of the date of the submission of the response to this Request for information should later become known, or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is inaccurate or incomplete, you must notify the EPA of this finding as soon as possible and provide a corrected response.

Attachment B

Questions

1. Provide a map of the combined sewer system tributary to the Union Street Pump Station. Include all regulators and cross-connections, both active and closed, with identifiers sufficient to identify each of the combined sewer overflow relief points listed in the Collection System Map, provided at EPA's December 16-18, 2013 inspection; the Annual Progress Report, dated June 28, 2013; and the CSO Flow Monitoring Plan Status Report, dated December 18, 2013.

2. Describe the current operating condition of the Union Street Pump Station. Include pumping capacity, the number of operational pumps, source of emergency power, and the most recent assessment of pump station condition.

3. Provide a list of dates since January 1, 2010 on which discharges from the combined sewer system or the sanitary sewer system have resulted in the release of sewage to the ground surface in the area tributary to the Union Street Pump Station. Include information regarding the depth and duration of storm event(s) preceding the discharge and the tidal conditions at the time of the discharge.

4. Describe the hydraulics of the combined sewer system tributary to the Union Street Pump Station for all sewers greater than or equal to 30 inches in diameter, and for any other sewer lines tributary to the Union Street Pump Station containing active CSO regulators. Provide the peak hydraulic grade line at mean high tide, for the 1-year, 2-year, 10-year, and 100-year storms of the following durations: 15 minutes, 60 minutes, 3 hours, and 24 hours. This analysis should account for daily peak flows due to diurnal variations and seasonal peak flows during periods of increased infiltration. Include for reference the ground elevations, sewer manhole rim elevations, pipe invert elevations, pipe cross-section dimensions, pipe materials, and pipe slope.

5. Describe the hydraulics of the storm drain system, as it existed on October 9, 2013, from CSO regulator 031 downstream to the outfall to New Haven Harbor. Provide the peak hydraulic grade line at mean high tide, for the 1-year, 2-year, 10-year, and 100-year storms of the following durations: 15 minutes, 60 minutes, 3 hours, and 24 hours. This analysis should account for daily peak flows due to diurnal variations and seasonal peak flows during periods of increased infiltration. Include for reference the ground elevations, sewer manhole rim elevations, pipe invert elevations, pipe cross-section dimensions, pipe materials, pipe slope, the elevation of the overflow weir, and the elevation of the rim of the lowest catch basin inside the UARG.

6. Describe the storm with the minimum return period that would result, as it existed on October 9, 2013, in the presence of sewage outside of the collection system at the Under Air Rights Garage during mean high tide, daily peak sewer flows, and seasonal peak infiltration flows. Include the duration and depth of storm, and

identify the precise points in the separate sanitary sewers and combined sewer collection system from which sewage would be released.

7. Describe the storm with the minimum return period that, given current conditions, will result in the presence of sewage outside of the collection system at the Under Air Rights Garage during mean high tide, daily peak sewer flows, and seasonal peak infiltration flows. Include the duration and depth of storm, and identify the precise points in the separate sanitary sewers and combined sewer collection system from which sewage will be released.

8. Describe the hydraulics of the storm drainage system from CSO regulator 034 downstream to the outfall to New Haven Harbor. Provide the peak hydraulic grade line at mean high tide, for the 1-year, 2-year, 10-year, and 100-year storms of the following durations: 15 minutes, 60 minutes, 3 hours, and 24 hours. This analysis should account for daily peak flows due to diurnal variations and seasonal peak flows during periods of increased infiltration. Include for reference, the ground elevations, sewer manhole rim elevations, pipe invert elevations, pipe cross-section dimensions, pipe materials, pipe slope, the elevation of the overflow weir, and the elevation of the lowest floor in the Temple Street Garage.

9. Describe the storm with the minimum return period that, given current conditions, will result in the presence of sewage outside of the collection system at the Temple Street Garage during mean high tide, daily peak sewer flows, and seasonal peak infiltration flows. Include the duration and depth of storm, and identify the precise points in the separate sanitary sewers and combined sewer collection system from which sewage will be released.

10. Describe the methodology used to perform the hydraulic analysis for Questions 4 through 9. Include information regarding storm hydrographs used.

11. Provide information describing each active CSO regulator in the GNHWPCA collection system. For each CSO regulator, include:

    a. the latitude and longitude of its location;

    b. its current status as active or closed;

    c. the CSO outfall to which it flows;

    d. the time period for which flow metering has been performed;

    e. the number of activations during calendar year 2013; and

    f. the storm with the minimum return period for which a discharge occurred during calendar year 2013.

12. For each CSO outfall and CSO regulator closed since January 1, 1997, identify the date on which the structure was closed, and describe the measures taken to close the structure.

13. By January 31, 2015, provide a System Characterization consistent with Section 2 of EPA's September 1995 *Combined Sewer Overflows Guidance for Long Term Control Plan* ("LTCP Guidance")(EPA 832-b-95-002).

14. By July 31, 2015, provide a Development of Alternatives for CSO Control Update ("Alternatives Update") consistent with Section 3.3 of EPA's LTCP Guidance.

ATTACHMENT C

Statement of Certification

Complete and Include With Your Response

I declare under penalty of perjury that I am authorized to respond on behalf of the Greater New Haven Water Pollution Control Authority. I certify that the foregoing responses and information submitted were prepared by me, or under my direction or supervision and that I have personal knowledge of all matters set forth in the responses and the accompanying information. I certify that the responses are true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

By_____
(Signature)

_____
(Title)

_____
(Date)